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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MATTHEW JACKSON, an individual,

Plaintiff,

vs.

UNICITY INTERNATIONAL, INC., a
Delaware corporation; ANYTIME LABOR,
L.L.C., a Nevada limited liability company,

Defendants.

Case No. 2:25-cv-00738-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S
COMPLAINT
(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Matthew Jackson ("Plaintiff"), by and through his counsel, Greenberg Gross LLP, and Defendant, Anytime Labor, LLC ("Defendant Anytime Labor"), by and through its counsel, the law firm of Jackson Lewis P.C., that Defendant shall have a 2-week extension up to and including **June 20, 2025**, in which to file its response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Defendant Anytime labor was served with the Summons and Complaint on May 15, 2025, (ECF No. 1) making Defendant's response to Plaintiff's Complaint currently due on June 5, 2025.

2. Defendant Anytime Labor was recently retained and is still in the process of investigating Plaintiff's allegations which include significant monetary damages, including, punitive damages.

3. The Parties have agreed to extend the deadline for Defendant Anytime Labor to file its response to Plaintiff's Complaint to June 20, 2025, to allow Defendant Anytime Labor sufficient time to address the allegations within the Complaint.

4. This is the first stipulation to extend the time for Defendant Anytime Labor to respond to Plaintiff's Complaint.

5. The Parties believe these circumstances constitute good cause for granting an extension. *See* Fed. R. Civ. P. 6(b)(1).

6. This Stipulation is made in good faith and not for the purpose of delay.

7. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

Dated this 5th day of June, 2025.

GREENBERG GROSS LLP

JACKSON LEWIS P.C.

/s/ Marian L. Massey

/s/ Thomas W. Maroney

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Anytime Labor LLC

ORDER

IT IS SO ORDERED.



United States District Magistrate Judge

Dated: June 6, 2025